

# UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

# **ANNUAL AUDITED REPORT FORM X-17A-5** PART III

**FACING PAGE** Information Required of Brokers and Dealers Pursuant to Section 17 of the

**OMB APPROVAL** 

OMB Number: 3235-0123 Expires: February 28, 2010

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SEC FILE NUMBER

Securities Exc	hange Act of 1934 and	Rule 17a-5 Thereunder	•
REPORT FOR THE PERIOD BEGINNING	01/01/09 MM/DD/YY	AND ENDING	12/31/09 MM/DD/YY
A. R	EGISTRANT IDENT	IFICATION	
NAME OF BROKER-DEALER:			OFFICIAL USE ONLY
G.A. Repple & Company (a wholly owned subsidia	ary of G.A. Repple Financ	ial Group, Inc.)	FIRM I.D. NO.
ADDRESS OF PRINCIPAL PLACE OF BUSINES		No.)	<u> </u>
101 Normandy Road	(No. and Street)		
	(No. and Street)		
Casselberry	Florida	32	707
(City)	(State)	(Zi	p Code)
NAME AND TELEPHONE NUMBER OF PERSO	ON TO CONTACT IN RE	GARD TO THIS REPORT	
andra J. Albano			339-9090
		(Area Code	- Telephone No.)
B. AC	COUNTANT IDENT	IFICATION	
NDEPENDENT PUBLIC ACCOUNTANT whose	opinion is contained in th	e Report*	
arr, Riggs & Ingram, LLC			
(Name – į	f individual, state last, first, middle n	ame)	
031 W. Morse Blvd., Suite 200, Winter Park, Flori	da 32789		
(Address)	(City)	(State)	(Zip Code)
CHECK ONE:  Certified Public Accountant  Public Accountant		RE	EXCHANGE COMMISSION
☐ Accountant not resident in United State	s or any of its possessions	MAR	1 2010
	FOR OFFICIAL USE ONLY	BRANCH O	REGISTRATIONS
			AND MINATIONS

<sup>\*</sup>Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant rust be supported by a statement of facts and circumstances relied on as the basis for the exemption. See section 240.17a-5(e)(2).

# OATH OR AFFIRMATION

I, Glenn A. Repple	, swear (or affirm) that, to the
best of my knowledge and belief the accompanying financial statement and	supporting schedules pertaining to the firm of
G. A. Repple & Company	
as of December 31, 2009, are true and correct. I further swear (or affirm)	that neither the company nor any partner,
proprietor, principal officer of director, has any proprietary interest in any ac	count classified solely as that of a customer,
except as follows:	
None	
Sworn & Subscribed before me on Jan 20, 2010 by Glenn A. Repple	lluffe
	resident Signature 0
Sandia Q albano	Title
A SE LIV COMM	DRA J. ALBANO IISSION # DD 926802
TOTAL TOTA	S: October 2, 2013 Notary Public Underwriters
(a) Facing page.	A CONTRACTOR OF THE CONTRACTOR
(b) Statement of Financial Condition.	
(c) Statement of Income (Loss).	•
(d) Statement of Changes in Financial Condition.	
(e) Statement of Changes in Stockholders' Equity or Partners' or Sole Prop.	rietor's Capital.
(f) Statement of Changes in Liabilities Subordinated to Claims of Creditors	
(g) Computation of Net Capital.	
(h) Computation for Determination of Reserve Requirements Pursuant to R	ule 15c3-3.
(i) Information Relating to the Possession or control Requirements Pursuan	t to Rule 15c3-3.
(j) A Reconciliation, including appropriate explanation, of the Computation	of Net Capital Under Rule 15c3-1 and the
Computation for Determination of the Reserve Requirements Under Exh	nibit A of Rule 15c3-3.
u (k) A Reconciliation between the audited and unaudited Statements of Finan	ncial Condition with respect to methods of
consolidation.	
(I) An Oath or Affirmation.	
(m) A copy of the SIPC Supplemental Report.	
(n) A report describing any material inadequacies found to exist or found to	have existed since the date of the previous audit.
	•

<sup>\*\*</sup>For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3).

# Financial Statements

G.A. Repple & Company SEC

Mail Processing Section

December 31, 2009

MAR 0 1 2010

Washington, DC 120



Carr, Riggs & Ingram, LLC 1031 West Morse Boulevard Suite 200 Winter Park, Florida 32789

(407) 644-7455 (407) 628-5277 (fax) www.cricpa.com

#### Independent Auditor's Report

Board of Directors G.A. Repple & Company Casselberry, Florida

We have audited the accompanying statement of financial condition of G.A. Repple & Company, as of December 31, 2009, and the related statements of operations, changes in shareholder's equity, and cash flows for the year then ended that you are filing pursuant to rule 17a-5 under the Securities Exchange Act of 1934. These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these financial statements based on our audit.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of G.A. Repple & Company, as of December 31, 2009, and the results of its operations and its cash flows for the year then ended in conformity with accounting principles generally accepted in the United States of America.

Our audit was conducted for the purpose of forming an opinion on the basic financial statements taken as a whole. The information contained in the supplementary schedules, computation of net capital and computation of aggregate indebtedness, as of December 31, 2009, are presented for purposes of additional analysis and are not a required part of the basic financial statements, but are supplementary information required by rule 17a-5 under the Securities Exchange Act of 1934. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and, in our opinion, is fairly stated in all material respects in relation to the basic financial statements taken as a whole.

Come Riggs & Therm LLC

February 24, 2010

## STATEMENT OF FINANCIAL CONDITION

# **DECEMBER 31, 2009**

## **ASSETS**

Cash and cash equivalents Clearing account deposits, restricted	\$ 927,129 50,087
Securities owned, at market	8,796
Commissions receivable	350,534
Other receivables	488
Prepaid expenses	 33,462
	\$ 1,370,496
LIABILITIES AND SHAREHOLDER'S EQUITY	
Accounts payable and accrued expenses	\$ 107,851
Commissions payable	 264,881
	 372,732
Shareholder's equity:	
Common stock, \$1 par value; 7,500 shares authorized,	
100 shares issued and outstanding	100
Additional paid-in capital	24,900
Retained earnings	 972,764
-	 997,764
	\$ 1,370,496

# STATEMENT OF OPERATIONS

# FOR THE YEAR ENDED DECEMBER 31, 2009

Revenues:	
Commissions	\$ 5,803,949
Investment advisory fees	814,524
Principal transactions	956,448
Due diligence fees	139,967
Interest and dividends	9,438
Other	2,510_
	7,726,836
Expenses:	
Commissions	5,290,027
Overhead expense	2,038,900
Clearing fees	393,683
Maintenance and support	54,220
Net trading losses	6,161
Other	160,697
Postage and freight	33,789
Professional services	48,398
Marketing	1,683
Dues and subscriptions	18,374_
	8,045,932
Net loss	\$ (319,096)

# G.A. REPPLE & COMPANY STATEMENT OF CHANGES IN SHAREHOLDER'S EQUITY FOR THE YEAR ENDED DECEMBER 31, 2009

	Commo Shares	n stock Amount	Additional paid-in capital	Retained earnings	Total
Balances, January 1, 2009 as previously reported	100	\$ 100	\$ 24,900	\$ 1,383,897	\$ 1,408,897
Prior period adjustment - error calculating commission payable				(92,037)	(92,037)
Balances, January 1, 2009 as restated	100	100	24,900	1,291,860	1,316,860
Net loss for the year ended December 31, 2009				(319,096)	(319,096)
Balances, December 31, 2009	100	\$ 100	\$ 24,900	\$ 972,764	\$ 997,764

### STATEMENT OF CASH FLOWS

# FOR THE YEAR ENDED DECEMBER 31, 2009

Cash flows from operating activities:	
Net loss	\$ (319,096)
Adjustments to reconcile net loss to net cash	
used by operating activities:	
Decrease in securities owned	36,927
Increase in commissions receivable	(17,392)
Decrease in other receivables	537
Decrease in prepaid expenses	8,268
Decrease in accounts payable and accrued expenses	(34,505)
Decrease in commissions payable	 (5,804)
Total adjustments	(11,969)
Net cash used by operating activities and net decrease	
in cash and cash equivalents	 (331,065)
Cash and cash equivalents at beginning of year	 1,258,194
Cash and cash equivalents at end of year	\$ 927,129

#### NOTES TO FINANCIAL STATEMENTS

#### YEAR ENDED DECEMBER 31, 2009

#### 1. Nature of operations and summary of significant accounting policies:

### Nature of operations and organization:

G. A. Repple & Company (the "Company") is a Florida corporation and a wholly owned subsidiary of G.A. Repple Financial Group, Inc. (the "Parent"). The Company is registered as a broker/dealer and investment advisor under the Securities and Exchange Act of 1934. It is a fully disclosed broker/dealer whereby it does not hold customer funds or securities. The Company is a member of the Financial industry Regulatory Authority (FINRA), the Municipal Securities Rulemaking Board (MSRB), and the Securities Investor Protection Corporation (SIPC).

In its capacity as a broker/dealer, the Company buys and sells securities for individual clients. It also provides financial planning and asset management services using third party asset managers.

#### Cash equivalents:

For purposes of reporting cash flow, cash and cash equivalents include money market accounts and any highly liquid debt instruments purchased with a maturity of three months or less.

#### Securities owned:

Securities owned are valued at market. The resulting difference between cost and market is included in the statement of operations.

#### Concentration of credit risk:

The Company maintains cash and cash equivalent deposits at banks and other financial institutions. Cash deposits in the banks, at times, exceed federally insured limits. Cash equivalent deposits in other financial institutions are not federally insured. The Company has not experienced any losses in its cash and cash equivalents, and believes that there is no significant risk with respect to these deposits.

#### Clearing account deposits:

The Company is required to maintain cash balances with clearing agents, which are restricted as to use.

#### Receivables and allowance for doubtful accounts:

Commissions receivable are recorded on a trade-date basis as securities transactions occur. Receivables are stated at the amount management expects to collect from outstanding balances. The Company accounts for potential losses in receivables utilizing the allowance method. In reviewing aged receivables, the Company considers its knowledge of customers, historical activity and current economic conditions in establishing an allowance for doubtful accounts. Account balances are charged off against the allowance after all means of collection have been exhausted and the potential for recovery is considered remote. Management believes that all receivables are fully collectible. Accordingly, no allowance for doubtful accounts is required.

#### NOTES TO FINANCIAL STATEMENTS - CONTINUED

#### FOR THE YEAR ENDED DECEMBER 31, 2009

#### 1. Nature of operations and summary of significant accounting policies - continued:

#### Use of estimates:

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts in the statement of financial condition and accompanying notes. Accordingly, actual results could differ from those estimates.

#### Income taxes:

The Company's financial information is included in the consolidated federal and state income tax returns filed by the Parent. The Parent allocates to the Company its proportionate share of the consolidated federal and state tax liabilities on a separate company basis. The Company does not have a funding agreement requiring its share of taxes to be remitted or refunded to/from its Parent.

The Company records deferred taxes using the liability method. Deferred taxes are recorded to reflect the tax consequences on future years of temporary differences between the tax bases of assets and liabilities and their financial reporting amounts at year end, based on enacted tax laws and statutory tax rates applicable to periods in which the differences are expected to affect taxable income. Valuation allowances are established when necessary to reduce deferred tax assets to the amount expected to be realized.

#### 2. Securities owned:

Securities owned are shown on the statement of financial condition at fair market value. The following realized and unrealized losses are included in the statement of operations for the year ended December 31, 2009.

Market value of securities owned Less cost of securities owned Total net unrealized loss Less net unrealized gain recognized in prior years Current year unrealized gain	\$ 8,796 (8,888) (92) (232) 140
Proceeds from sale of securities owned Less cost of securities owned Total net realized loss Less net unrealized gain recognized in prior years Current year realized loss	30,764 (44,100) (13,336) (7,035) (6,301)
Net trading losses	<u>\$ (6,161)</u>

#### NOTES TO FINANCIAL STATEMENTS - CONTINUED

#### FOR THE YEAR ENDED DECEMBER 31, 2009

#### 3. Related party transactions:

The company is managed by its parent and sole stockholder, G.A. Repple Financial Group, Inc. (RFG). Consequently, operating results and financial position may be different than if the entities were autonomous. The Company pays RFG for overhead expenses. The overhead expense represents reimbursement for the cost associated with office space, telephone and staff support. The Company paid \$2,038,900 to RFG for overhead expense for the year ended December 31, 2009.

The Company has entered into agreements with affiliated entities to act as a placement agent. Commissions earned are established in the agreements with the product sponsor as a percentage of funds raised. Commissions were earned relative to sales of private placements under the above agreements in the amount of \$101,240, in which the President of G.A. Repple & Company has a direct ownership interest, and \$63,740 in which the President of G.A. Repple & Company has an indirect ownership interest.

#### 4. Net capital requirements:

The Company is subject to the Securities and Exchange Commission Uniform Net Capital Rule (rule 15c3-1), which requires the maintenance of minimum net capital at an amount equal to the greater of \$50,000 or 6 3% of aggregate indebtedness, and requires that the ratio of aggregate indebtedness to net capital not exceed 15 to 1.

At December 31, 2009, the Company had excess net capital of \$846,991 and a net capital ratio of .42 to 1.

## 5. Liabilities subordinated to claims of creditors and computation of customer reserves:

The Company has no liabilities subordinated to claims of creditors.

The Company operates pursuant to the (k)(2)(ii) exemptive provision of SEC Rule 15c3-3 and is therefore exempt from the computation for determination of reserve requirements. The company is exempt from the possession and control requirements under SEC rule 15c3-3 in that it carries no customer accounts and promptly transmits all funds and securities to its clearing broker/dealers.

#### NOTES TO FINANCIAL STATEMENTS - CONTINUED

#### FOR THE YEAR ENDED DECEMBER 31, 2009

6	Income	taxes

The components of the net deferred tax asset as of December 31, 2009 are as follows:

Deferred tax asset	\$ 64,313
Deferred tax liability	-
Valuation allowance	<u>(64,313)</u>
	\$

The provision for income taxes differs from the amount that would result from applying a statutory rate of 34% primarily due to the valuation allowance and temporary differences arising from accrued contingent liabilities. The valuation allowance increased by \$64,313 for the year ended December 31, 2009.

At December 31, 2009, the Company had an operating loss carry forward of approximately \$226,000 that may be offset against future federal and state taxable income. The carry forwards expire starting in 2029 for federal and state purposes.

The Company adopted the provisions of FASB ASC (Accounting Standards Codification) No. 740, Accounting for Uncertainty in Income Taxes, on January 1, 2009. As a result of the implementation of ASC No. 740, the Company has not recognized any respective liability for unrecognized tax benefits as it has no known tax positions that would subject the Company to any material income tax exposure. A reconciliation of the beginning and ending amount of unrecognized tax benefits is not included, nor is there any interest accrued related to unrecognized tax benefits in interest expense or penalties in operating expenses as there are no unrecognized tax benefits. The tax years that remain subject to examination are the periods beginning on January 1, 2006 for all major tax jurisdictions.

#### 7. Supplementary disclosures of cash flow information:

Cash was paid during the year for:

Interes	est	\$
Income	ne taxes	<u>\$</u>

#### NOTES TO FINANCIAL STATEMENTS - CONTINUED

#### FOR THE YEAR ENDED DECEMBER 31, 2009

#### 8. Contingencies:

The Company received two claims from clients which were the result of monetary losses on investments and the freezing of investments following the bankruptcy of a company whose investment programs were offered to G.A. Repple & Company's investors. The first claim is unasserted and the Company has proposed a settlement in the amount of \$30,000, which has been charged to operations in the accompanying financial statements for 2009. The second claim was filed by one if its clients for alleged selling of unsuitable investment products. The claim asks for actual and punitive damages totaling \$420,000, plus interest and legal fees. The Company has proposed a settlement in the amount of \$70,000, which has been charged to operations in the accompanying financial statements for 2009. If the settlement offer is not accepted and the case goes to trial, the amount of the ultimate loss to the Company, if any, may equal the amount of damages sought by the plaintiff. The amounts accrued are included in the Statement of Financial Condition under the caption "Accounts payable and accrued expenses".

#### 9. Subsequent events:

Subsequent events were evaluated through the date the financial statements were available to be issued. The financial statements were approved and authorized for issue by management on February 24, 2010.

#### 10. Prior period adjustment:

Retained earnings at the beginning of 2009 has been adjusted to correct an error calculating commissions payable in 2008. Had the error not been made, net income for 2008 would have been decreased by \$92,037. The error would have had no effect on income taxes as the resulting deferred tax asset would have been fully reserved against.

SUPPLEMENTARY INFORMATION

# COMPUTATION OF NET CAPITAL UNDER RULE 15c3-1 OF THE SECURITIES AND EXCHANGE COMMISSION

# **DECEMBER 31, 2009**

Net capital Total shareholder's equity	\$ 997,764
Deductions: Non-allowable assets:	
Commissions receivable over 30 days old	45,825
Prepaid expenses	33,462
Corporate bonds	8,796
Other receivables	488
Money market interest receivable	49_
	88,620
Net capital before haircuts on securities positions	909,144
Haircuts on securities	(12,153)
Net capital	\$ 896,991
Reconciliation with Company's computation (included in Part II of Form X-17A-5 as of December 31, 2009)  Net capital, as reported in Company's Part II	
FOCUS report	\$ 1,068,600
Adjustments:	
Commissions receivable over 30 days old	(45,825)
Audit adjustments	(125,783)
Rounding	(1)
	(171,609)
	\$ 896,991

# COMPUTATION OF AGGREGATE INDEBTEDNESS UNDER RULE 17a-5 OF SECURITIES AND EXCHANGE COMMISSION

# **DECEMBER 31, 2009**

Aggregate indebtedness: Accounts payable and accrued expenses Commissions payable	\$ 107,851 264,881
	\$ 372,732
Ratio of aggregate indebtedness to net capital	.42 to 1



Carr, Riggs & Ingram, LLC 1031 West Morse Boulevard Suite 200 Winter Park, Florida 32789

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# Independent Auditor's Report On Internal Control Required By SEC Rule 17a-5

The Board of Directors G.A. Repple & Company Casselberry, Florida

In planning and performing our audit of the financial statements and supplemental schedules of G.A. Repple & Company (the "Company"), as of and for the year ended December 31, 2009, in accordance with auditing standards generally accepted in the United States of America, we considered the Company's internal control over financial reporting ("internal control") as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control. Accordingly, we do not express an opinion on the effectiveness of the Company's internal control.

Also, as required by rule 17a-5(g)(1) of the Securities Exchange Commission, (the "SEC"), we have made a study of the practices and procedures followed by the Company, including consideration of control activities for safeguarding securities. This study included tests of such practices and procedures that we considered relevant to the objectives stated in rule 17a-5(g) in making the periodic computations of aggregate indebtedness and net capital under rule 17a-3(a)(11) and for determining compliance with the exemptive provisions of Rule 15c3-3. Because the Company does not carry securities accounts for customers or perform custodial functions relating to customer securities, we did not review the practices and procedures followed by the Company in any of the following:

- 1. Making quarterly securities examinations, counts, verifications, and comparisons and recordation of differences required by rule 17a-13
- 2. Complying with the requirements for prompt payment for securities under Section 8 of Federal Reserve Regulation T of the Board of Governors of the Federal Reserve System

The management of the Company is responsible for establishing and maintaining internal control and the practices and procedures referred to in the preceding paragraph. In fulfilling this responsibility, estimates and judgments by management are required to assess the expected benefits and related costs of controls and of the practices and procedures referred to in the preceding paragraph, and to assess whether those practices and procedures can be expected to achieve the SEC's above-mentioned objectives. Two of the objectives of internal control and the practices and procedures are to provide management with reasonable, but not absolute assurance that assets for which the Company has responsibility are safeguarded against loss from unauthorized use or disposition and that the transactions are executed in accordance with management's authorization and recorded properly to permit the preparation of financial statements in conformity with generally accepted accounting principles. Rule 17a-5(g) lists additional objectives of the practices and procedures listed in the preceding paragraph.

Because of inherent limitations in internal control and the practices and procedures referred to above, error or fraud may occur and not be detected. Also, projection of any evaluation of them to future periods is subject to the risk that they may become inadequate because of changes in conditions or that the effectiveness of their design and operation may deteriorate.

A *control deficiency* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect misstatements on a timely basis. A *significant deficiency* is a deficiency, or combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charges with governance.

A material weakness is a deficiency, or combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the Company's financial statements will not be prevented or detected and corrected on a timely basis.

Our consideration of internal control was for the limited purpose described in the first and second paragraphs and would not necessarily identify all deficiencies in internal control that might be material weaknesses. However, we identified the following deficiencies in internal control that we consider to be material weaknesses, as defined above. These conditions were considered in determining the nature, timing, and extent of the procedures performed in our audit of the financial statements of G.A. Repple & Company as of and for the year ended December 31, 2009, and this report does not affect our report thereon dated February 24, 2010.

#### Accrual of commissions payable

It was noted during our audit that the Company did not accrue commissions payable that correspond with the investment activity through National Financial Services. It is the responsibility of management to record all transactions occurring within the Company. These transactions are significant for a fair presentation of the Company's financial position and operating results.

We understand that practices and procedures that accomplish the objectives referred to in the second paragraph of this report are considered by the SEC to be adequate for its purposes in accordance with the Securities Exchange Act of 1934 and related regulations, and that practices and procedures that do not accomplish such objectives in all material respects indicate a material inadequacy for such purposes. Based on this understanding and on our study, we believe that the Company's practices and procedures, as described in the second paragraph of this report, were adequate at December 31, 2009, to meet the SEC's objectives, except as noted above.

This report is intended solely for the information and use of the Stockholder, management, the SEC, and other regulatory agencies that rely on Rule 17a-5(g) under the Securities Exchange Act of 1934 in their regulation of registered brokers and dealers, and is not intended to be and should not be used by anyone other than these specified parties.

Come Riggs & INGMM LLC

February 24, 2010



Carr, Riggs & Ingram, LLC 1031 West Morse Boulevard Suite 200 Winter Park, Florida 32789

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# Independent Accountant's Report On Applying Agreed-Upon Procedures

To the Board of Directors G.A. Repple & Company Casselberry, Florida

In accordance with Rule 17a-5(e)(4) under the Securities Exchange Act of 1934, we have performed the procedures enumerated below with respect to the accompanying Schedule of Assessment and Payments to the Securities Investor Protection Corporation ("SIPC") for the year ended December 31, 2009, which were agreed to by G.A. Repple & Company and the Securities and Exchange Commission, Financial Industry Regulatory Authority, Inc., and SIPC solely to assist you in evaluating G.A. Repple & Company's compliance with Rule 17a-5(e)(4). G.A. Repple & Company's management is responsible for G.A. Repple & Company's compliance with those requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in the report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

Our procedures and findings are as follows:

- 1. We compared the listed assessment payments with respective cash disbursements records entries noting no exceptions.
- 2. We compared the amounts reported on the audited Form X-17A-5, as amended, for the year ended December 31, 2009 with the amounts reported in the Transitional Assessment Reconciliation ("Form SIPC-7T"), as amended for the year ended December 31, 2009 noting no exceptions.
- 3. We compared any adjustments reported in Form SIPC-7T, as amended, with supporting schedules and working papers noting no exceptions.
- 4. We proved the arithmetical accuracy of the calculations reflected in Form SIPC-7T, as amended, and in the related schedules and working papers supporting the adjustments noting no exceptions.
- 5. We compared the amount of any overpayment applied with the Form SIPC-7T, as amended, on which it was computed. There was no overpayment noted.

We were not engaged to, and did not, conduct an audit, the objective of which would be the expression of an opinion, on compliance. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the specified parties above and is not intended to be and should not be used by anyone other than those specified parties.

Come Riggs & Stramm LLC

February 24, 2010

# SIPC-7T

# SECURITIES INVESTOR PROTECTION CORPORATION 805 15th St. N.W. Suite 800, Washington, D.C. 20005-2215 202-371-8300

(29-REV 12/09)

Transitional Assessment Reconciliation (Read carefully the instructions in your Working copy before completing this Form) (29-REV 12/09)

A	Ne	NDED AS TO BE FILED BY ALL SIPC MEMB	ERS V	NITH FISCAL YEAR END	DINGS	
		<b>2/25/2010</b> The of Member, address, Designated Examining Authority, 19 The ses of the audit requirement of SEC Rule 17a-5:	934 Act	registration no. and month	h in which fiscal year ends for	- 1
		035315 FINRA Dec G. A. Repple + Co 12*12	requir	any of the information shes correction, please e-ma sipc.org and so indicate or	il any corrections to	+
		101 NORMANDY Rd STE 101 CASSELBERRY FL 32707-3864		and telephone number of pling this form.	person to contact	<
	L	_ ′	<u> </u>	W CHINIOURD	F020	
2.	Α.	General Assessment [item 2e from page 2 (not less than \$	150 mi	nimum)]	\$ <u>5'/8'/</u>	
	В.	Less payment made with SIPC-6 filed including \$150 paid wit	h 2009	SIPC-4 (exclude interest)	2035	)
	C.	Date Paid Less prior overpayment applied			(	)
	D.	Assessment balance due or (overpayment)			3752	
	E.	Interest computed on late payment (see instruction E) for_	(	days at 20% per annum		
	F. Total assessment balance and interest due (or overpayment carried forward)			s 3752		
	G.	PAID WITH THIS FORM: Check enclosed, payable to SIPC Total (must be same as F above)	\$	3752		
	Н.	Overpayment carried forward	\$(		_)	
3.	Sub	sidiaries (S) and predecessors (P) included in this form (gi	ive nam	e and 1934 Act registration	n number):	
pe: tha	sor t al	PC member submitting this form and the by whom it is executed represent thereby I information contained herein is true, correct mplete.	G.	M	Office PENY ership or other arganization)	
Da	ted	the 25 day of February, 2010.	PRE	Sident (Authorized		
Th	is f	orm and the assessment payment is due 60 days after the period of not less than 6 years, the latest 2 years in an	he end easily	of the fiscal year. Retain accessible place.	the Working Copy of this form	-
SIPC REVIEWER	D	ates:				
S S	С	alculations Document	ation _		Forward Copy	
CR	E	xceptions:				
S	D	isposition of exceptions:				

# DETERMINATION OF "SIPC NET OPERATING REVENUES" AND GENERAL ASSESSMENT

Amended Filing

Amounts for the fiscal period beginning April 1, 2009 and ending De Cantel. 20

Ham No As of 2/2		5 871 846
Item No. 2a. Total revenue (FOCUS Line 12/Part IIA Line 9, Code 4030)		3 8 11 040
<ul> <li>2b. Additions:         <ul> <li>(1) Total revenues from the securities business of subsidiaries (excepted predecessors not included above.</li> </ul> </li> </ul>	ept foreign substdiaries) and	
(2) Net loss from principal transactions in securities in trading account	ınts.	
(3) Net loss from principal transactions in commodities in trading ac	counts.	
(4) Interest and dividend expense deducted in determining item 2a.		
(5) Net loss from management of or participation in the underwriting	or dis <b>tr</b> ibution of securities.	
(6) Expenses other than advertising, printing, registration fees and profit from management of or participation in underwriting or dis	legal fees deducted in determining net tribution of securities.	
(7) Net loss from securities in investment accounts.		
Total additions		
Deductions:     (1) Revenues from the distribution of shares of a registered open el investment trust, from the sale of variable annuities, from the b advisory services rendered to registered investment companies accounts, and from transactions in security futures products.	usiness of insurance, from investment	3 424 474
(2) Revenues from commodity transactions.		
(3) Commissions, floor brokerage and clearance paid to other SIPC securities transactions.	members in connection with	131 346
(4) Reimbursements for postage in connection with proxy solicitation	n.	21.0
(5) Net gain from securities in investment accounts.		1 304
(6) 100% of commissions and markups earned from transactions in (ii) Treasury bills, bankers acceptances or commercial paper th from issuance date.	(i) certificates of deposit and at mature nine months or less	
(7) Direct expenses of printing advertising and legal fees incurred in related to the securities business (revenue defined by Section	n connection with other revenue 16(9)(L) of the Act).	
(8) Other revenue not related either directly or indirectly to the sec (See Instruction C):	urities <b>b</b> usiness.	
(9) (i) Total interest and dividend expense (FOCUS Line 22/PART I Code 4075 plus line 2b(4) above) but not in excess of total interest and dividend income.	1A Line 13,	
<ul><li>(ii) 40% of interest earned on customers securities accounts (40% of FOCUS line 5, Code 3960).</li></ul>	\$	
Enter the greater of line (i) or (ii)		2 550 190
Total deductions		3 557 189
2d. SIPC Net Operating Revenues		<u>s</u> 2 314 657
2e. General Assessment @ .0025	The state of the s	s 5 787
· · · · · · · · · · · · · · · · · · ·	2	(to page 1 but not less than \$150 minimum)